

**From:** [Beahm, Catherine](#)  
**To:** [Lancey, Susan](#)  
**Cc:** [Moore, Todd](#)  
**Subject:** Pyrolysis Oil  
**Date:** Thursday, November 14, 2013 3:02:28 PM  
**Attachments:** [Regulatory Status of Pyrolysis Oil under EPA Combustion Rules.docx \(2\).pdf](#)  
[Ensyn Overview to Dartmouth April20131.pdf](#)  
[RFO Description Fuel Spec and MSDS1.pdf](#)

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Hi Susan,

We have a vendor interested in selling pyrolysis oil in NH. Attached is a determination they submitted in which they argue the product is a fuel and thus when burned, the device in which it is burned would be covered under 40 CFR 63, Subparts DDDDD or JJJJJJ. Do you concur? Do you have any other facilities in Region 1 that are thinking of doing this and have received a determination under the NHSM rule? Also attached is a description of the product.

We believe it meets our definition of bio-oil: "Bio-oil" means a liquid fuel derived from vegetable oils, animal fats, wood, straw, forestry byproducts, or agricultural byproducts using noncombustion thermal, chemical, or biological processes, including, but not limited to, distillation, gasification, hydrolysis, or pyrolysis, but not including anaerobic digestion, composting, or incineration. This makes it exempt from our state toxics rule.

Let me know what you think. A hospital is considering converting over from #4 fuel to this product.

*Cathy Beahm*

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-----Original Message-----

**From:** [gtgosselin@aol.com](mailto:gtgosselin@aol.com) [<mailto:gtgosselin@aol.com>]  
**Sent:** Thursday, November 14, 2013 2:45 PM  
**To:** Beahm, Catherine  
**Subject:** EPA Info

Cathy,

Thanks again for meeting with me today. Attached is the information on the EPA determination. Let me know if this is sufficient.

Best Regards,

Greg